

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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KAREN WALD,

Plaintiff,

**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT**

-against-

17 CV 3560 (WFK)(SJB)

THE DEPARTMENT OF EDUCATION OF THE  
CITY OF NEW YORK, and THE CITY SCHOOL  
DISTRICT OF THE BOARD OF EDUCATION OF  
THE CITY OF NEW YORK,

Defendants.

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**PLEASE TAKE NOTICE** that, upon the Defendant's Local Rule 56.1 Statement of Undisputed Material Facts, dated October 22, 2018, the Declaration of Assistant Corporation Counsel Bruce Rosenbaum in Support of Defendant's Motion for Summary Judgment, dated October 22, 2018, and the exhibits annexed thereto, Defendant's Memorandum of Law in Support of Its Motion for Summary Judgment, dated October 22, 2018, and upon all other pleadings and proceedings herein, Defendant will move this Court, before the Honorable William F. Kuntz, United States District Judge, Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York, on a date and time to be designated by the Court, for an order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting Defendant summary judgment, dismissing this action in its entirety, entering judgment for Defendant, on the ground that there is no genuine issue of material fact to be tried and Defendant is entitled to judgment as a matter of law, and granting defendant such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with the minute order of the Court dated September 18, 2018, plaintiff is to serve her opposition papers by January 11, 2019, and defendant is to serve its reply by February 1, 2019.

Dated: New York, New York  
October 22, 2018

**ZACHARY W. CARTER**  
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By: /s/ *Bruce Rosenbaum*  
Bruce Rosenbaum  
Assistant Corporation Counsel  
  
J. Kevin Shaffer,\*  
\*Application for Admission Pending

Bruce Rosenbaum,  
J. Kevin Shaffer\*,  
\*Application for Admission Pending,  
Of Counsel.

Docket No. 17 CV 3560 (WFK)(SJB)
UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK
KAREN WALD,  <div style="text-align: right;">Plaintiff,</div> <div style="text-align: center;">-against-</div> THE DEPARTMENT OF EDUCATION OF THE CITY OF NEW YORK, and THE CITY SCHOOL DISTRICT OF THE BAORD OF EDUCATION OF THE CITY OF NEW YORK,  <div style="text-align: right;">Defendants.</div>
<b>NOTICE OF MOTION FOR SUMMARY JUDGMENT, DEFENDANT'S LOCAL RULE 56.1 STATEMENT AND DECLARATION</b>
<b>ZACHARY W. CARTER</b> <i>Corporation Counsel of the City of New York</i> <i>Attorney for Defendant</i> <i>100 Church Street, Rm. 2-188</i> <i>New York, N.Y. 10007</i>  <i>Of Counsel: Bruce Rosenbaum</i> <i>J. Kevin Shaffer*</i> <i>*Application for</i> <i>Admission Pending</i> <i>Tel: (212) 356-1105</i> <i>Matter No.: 2017-026672</i>
<i>Due and timely service is hereby admitted.</i>  <i>New York, N.Y. ...., 2018</i>  <i>..... Esq.</i>  <i>Attorney for .....</i>